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 Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

Indiezone, Inc., a Delaware corporation, and
 EoBuy, Limited an Irish private limited company,

vs.

Todd Rooke, Joe Rogness, Phil Hazel, Sam Ashkar,
 Holly Oliver and U.S. Bank, collectively the *RICO Defendants*;

Jingit LLC., Jingit Holdings LLC., Jingit Financial, Services LLC.,
 Music.Me, LLC., Tony Abena, John E. Fleming, Dan Frawley,
 Dave Moorehouse II, Chris Ohlsen, Justin James,
 Shannon Davis, Chris Karls in their capacities as officers,
 agents and/or employees of the Jingit LLC.,

Defendants in Negligence, and Aiding/Abetting;

Wal-Mart, General Electric, Target, DOE(s) and ROE(s) 1
 through 10, ***Defendants in Negligence Secondary***
-Vicarious Infringement,

Defendants .

) Case No. CV13-04280 VC

)
)
) **PLAINTIFFS'/COUNSEL'S MOTION**
) **REQUESTING AN ENLARGEMENT OF TIME**
) **TO FILE HIS FED R. C. P 56(b) MOTION**
) **PURSUAN TO CIVIL L.R. 7-11 AND**
) **THE COURT'S STANDING ORDERS**

) AND ORDER

)
) Hon. Vincent Chhabria
) Date: September 12, 2014

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs in the above-referenced at the Court House
 which is located at San Francisco Courthouse, Courtroom 4 - 17th Floor 450 Golden Gate

1 Avenue, San Francisco, California before the Vincent Chhabria, Judge of the United States
2 District Court for the District of Northern California, pursuant to the Court's Local Rule 7-
3 11 and the Standing Order of Judge Chhabria Plaintiff will and hereby does move the Court
4 for an order:

5 1. Granting Plaintiff Indiezone and Counsel Douglas R. Dollinger their
6 application to enlarge their time file a Motion pursuant to Fed R. Civ. P. 59(e).

7 2. The Motion is support by the Declaration of Attorney Douglas R. Dollinger.

8 Respectfully submitted,
9

10 Douglas R. Dollinger, Esq., NY Bar No. 2354926
11 Appearing *Pro Hac Vice*
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26 Attorneys for Plaintiff

27 **CERTIFICATE OF SERVICE**

28 I hereby certify that, in accordance with the Rules, on this date September 12, 2014, a
true and correct copy of the foregoing document was delivered to Defendants of Record, by
both ECF means and by 1st class mail to or through their Counsel of Record.

Douglas R. Dollinger, Esq., NY Bar No. 2354926
Appearing *Pro Hac Vice*

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Date: September 15, 2014

